



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

November 2, 2007

Gary Fields, Treasurer
American Bankers Association PAC (BankPac)
1120 Connecticut Avenue NW
Washington, DC 20036

Response Due Date:
December 4, 2007

Identification Number: C00004275

Reference: Amended July Monthly Report (6/1/07-6/30/07), received 8/15/07

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 3 items:

1. Schedule A of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §§110.1(d) and 110.2(d) prohibit a committee and its apparent affiliates from receiving any contribution from another political committee or person in excess of \$5,000 per calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information.

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

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Alternatively, the funds can be retained if within 60 days of receipt you (1) transferred the excessive amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund. Any request from a donor for a refund must be honored.

If the foregoing conditions for reattributions or transfers to a non-federal account were not met within 60 days of receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

2. Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a multicandidate committee and its apparent affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent

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to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

3. Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a committee and its apparent affiliates from making contributions to another political committee in excess of \$5,000 per calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an excessive contribution, you must notify the recipient and request a refund of the amount in excess of \$5,000. The refund of the excessive amount must be made within sixty (60) days of receipt of the contribution.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received.

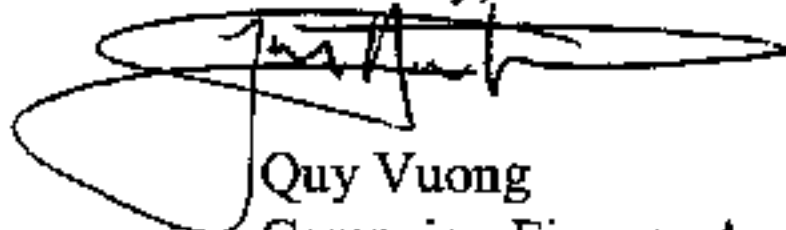
Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund will be taken into consideration.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

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Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1148.

Sincerely,

A handwritten signature in black ink, appearing to read 'Quy Vuong', is written over a horizontal line. The signature is stylized with a large loop on the left and a long horizontal stroke extending to the right.

Quy Vuong
Campaign Finance Analyst
Reports Analysis Division

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Excessive Contribution from a Committee

Contributor Name	Date	Amount	Report	Recipient Committee
Susquehanna Bancshares Inc. PAC	3/27/2007	\$5,000	2007 Mid-Year	Maryland Bankers Association Political Action Committee (Aka Maryland BankPAC)
Susquehanna Bancshares Inc. PAC	6/22/2007	\$2,000	2007 July Monthly	American Bankers Association PAC (BankPac)

Excessive Contribution(s) to Candidates(s) with an Affiliated Committee(s)

Recipient Name	Date	Amount	Election	Report	Contributing Affiliate
Barney Frank for Congress Committee	2/27/2007	\$250	P-2008	2007 Mid-Year	Massachusetts Bankers PAC-Federal Fund
Barney Frank for Congress Committee	3/26/2007	\$2,500	P-2008	2007 April Monthly	American Bankers Association PAC (BankPac)
Barney Frank for Congress Committee	3/26/2007	\$1,000	P-2008	2007 April Monthly	America's Community Bankers Community Campaign Committee
Barney Frank for Congress Committee	6/6/2007	\$1,500	P-2008	2007 July Monthly	American Bankers Association PAC (BankPac)
Citizens for Gillmor	2/14/2007	\$1,000	P-2008	2007 March Monthly	America's Community Bankers Community Campaign Committee

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Recipient Name	Date	Amount	Election	Report	Contributing Affiliate
Citizens for Gillmor	5/24/2007	\$2,000	P-2008	2007 June Monthly	America's Community Bankers Community Campaign Committee
Citizens for Gillmor	6/7/2007	\$2,000	P-2008	2007 July Monthly	American Bankers Association PAC (BankPac)
Citizens for Gillmor	6/25/2007	\$1,000	P-2008	2007 July Monthly	American Bankers Association PAC (BankPac)
Friends of Jim Marshall	3/2/2007	\$1,000	P-2008	2007 April Monthly	American Bankers Association PAC (BankPac)
Friends of Jim Marshall	3/2/2007	\$1,000	P-2008	2007 April Monthly	American Bankers Association PAC (BankPac)
Friends of Jim Marshall	4/30/2007	\$2,500	P-2008	2007 May Monthly	American Bankers Association PAC (BankPac)
Friends of Jim Marshall	5/24/2007	\$1,000	P-2008	2007 June Monthly	America's Community Bankers Community Campaign Committee

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Recipient Name	Date	Amount	Election	Report	Contributing Affiliate
Friends of Jim Marshall	6/12/2007	\$500	P-2008	2007 July Monthly	American Bankers Association PAC (BankPac)
Melissa Bean for Congress	3/19/2007	\$1,000	P-2008	2007 April Monthly	American Bankers Association PAC (BankPac)
Melissa Bean for Congress	3/19/2007	\$2,000	P-2008	2007 April Monthly	American Bankers Association PAC (BankPac)
Melissa Bean for Congress	4/25/2007	\$1,000	P-2008	2007 May Monthly	America's Community Bankers Community Campaign Committee
Melissa Bean for Congress	4/30/2007	\$1,000	P-2008	2007 May Monthly	American Bankers Association PAC (BankPac)
Melissa Bean for Congress	6/12/2007	\$1,000	P-2008	2007 July Monthly	American Bankers Association PAC (BankPac)

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Excessive Contributions to a Committee with an Affiliated Committee

Recipient Name	Date	Amount	Election	Report	Contributing Affiliate
Daniel Webster PAC	6/26/2007	\$1,000	G-2007	2007 July Monthly	America's Community Bankers Community Campaign Committee
Daniel Webster PAC	6/15/2007	\$5,000	G-2007	2007 July Monthly	American Bankers Association PAC (BankPac)

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